



1214803 - R8 SDMS



RE: EPA comments on PacifiCorp workplan

Craig Barnitz

to:

Joyce Ackerman, Brian King

02/24/2011 04:04 PM

Cc:

"Benjamin M. Clegg", "Dave Roskelley", "Dale Urban"

Hide Details

From: "Craig Barnitz" <cbarnitz@utah.gov>

To: Joyce Ackerman/R8/USEPA/US@EPA, "Brian King"
<Brian.King@PacifiCorp.com>Cc: "Benjamin M. Clegg" <Benjamin.Clegg@PacifiCorp.com>, "Dave Roskelley"
<dave@rrenviro.com>, "Dale Urban" <durban@utah.gov>

1 Attachment



WorkPlanComments_022211.PDF

Brian,

Attached are additional DRAFT comments from the UDEQ regarding the submitted *Work Plan*. Rather than duplicating comments that appeared in the letter dated February 17, 2011 from Joyce Ackerman (EPA), I have only included the comments that expand on those provided by the EPA or were not addressed by the EPA. While the UDEQ concurs with the comments addressed in the EPA letter, the UDEQ additionally submits the following comments (see also attached .pdf file):

Work Plan

Section 4.3 Soil Excavation:

- Under Section 4.3.1 "Contaminated Soil Removal" the last line addresses the "removal of existing foundation and other facilities". The activity of demolition of existing structures falls under the authority the Utah Division of Air Quality (UDAQ). The submittal and pending approval of this Work Plan does not

establish compliance with the rules and regulations of the UDAQ for demolition activity.

- To expand on comment 10 in the EPA letter, there is no mention of how the clean fill material will be addressed at the site once excavated. If the clean fill material is to be managed on-site, the need for storm water controls surrounding any soils piled on-site needs to be addressed further in Section 4.6.1

Appendix A Sampling and Analysis Plan

Section 3.3 Clearance (Confirmation) Air Sample QC:

- This section should include decontamination blanks. Although not an air sample, a sampling protocol needs to be developed to verify that decontamination methods used at the work site are effective and that equipment leaving the site can be considered thoroughly decontaminated

Appendix A Sampling and Analyses Plan

Page 6-25:

- The sections 5.3.2 Data Measurements Objectives, 5.3.2.1 Quality Assurance Guidance, and 5.3.2.3 Laboratory Analysis appear to be out of sequential order or there is a formatting issue with the section numbering in this portion of the appendix.

Appendix B Scope-of-Work:

- This first bullet point "Interior dust removal prior to demolition or removal (Work Phase #1)" again mentions activities that are under the authority of the UDAQ. As stated earlier, the submittal and pending approval of this Work Plan does not establish compliance with the rules and regulations of the UDAQ for demolition activity.

Please note that a finalized version of this attached letter will be mailed to you in the near future. If you have any questions or concerns please contact me at (801) 536-0071.

Thanks,
Craig

Craig Barnitz
Environmental Scientist
Emergency Response/Site Assessment
UDEQ/DERR
Phone: (801) 536-0071
Fax: (801) 536-4242
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February 23, 2011

Brian King, P.E.
Rocky Mountain Power
1407 West North Temple
Salt Lake City, Utah 84116

Dear Mr. King,

This letter is being sent to provide comments to the *Work Plan and Appendices* for the proposed expansion of the substation at the Rocky Mountain Power 3rd West Substation facility located 147 South 400 West, Salt Lake City, Utah. The property is located within the site boundaries for the Vermiculite Intermountain site and is currently covered under an Environmental Covenant which requires the notification of the Utah Department of Environmental Quality (UDEQ) and the U.S. Environmental Protection Agency (EPA) if the protective cap is to be disturbed during any activity conducted at the site.

In a letter dated February 17, 2011, Joyce Ackerman, EPA On-Scene Coordinator, forwarded comments and concerns that will need to be addressed in future revisions to the *Work Plan*. While the UDEQ concurs with the comments addressed in that letter, the UDEQ additionally submits the following comments:

Work Plan

Section 4.3 Soil Excavation:

- Under Section 4.3.1 "Contaminated Soil Removal" the last line addresses the "removal of existing foundation and other facilities". The activity of demolition of existing structures falls under the authority the Utah Division of Air Quality (UDAQ). The submittal and pending approval of this Work Plan does not establish compliance with the rules and regulations of the UDAQ for demolition activity.
- To expand on comment 10 in the EPA letter, there is no mention of how the clean fill material will be addressed at the site once excavated. If the clean fill material is to be managed on-site, the need for storm water controls surrounding any soils piled on-site needs to be addressed further in Section 4.6.1.

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If you have any further questions regarding these comments to the *Work Plan and Appendices*, please contact Craig Bamitz at (801) 536-0071.

Sincerely,

Dale T. Urban, P.G.
Site Assessment Section Manager
Division of Environmental Response and Remediation

Cc: Utah Department of Environmental Quality, Division of Air Quality